

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

-----  
ETHICON NON-REVISION PTO 298  
(ELECTION WAVE) CASES LISTED IN  
EXHIBIT A

JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF  
CHRISTINA PRAMUDJI, M.D. FOR NON-REVISION PTO 298 (ELECTION WAVE)**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion, memorandum and reply brief filed in relation to Christina Pramudji for Ethicon Wave 1, Dkt. 2035 (motion), Dkt. 2037 (memorandum in support), Dkt. 2236 (reply). Plaintiffs respectfully request that the Court exclude Christina Pramudji's testimony, for the reasons expressed in the Wave 1 briefing. This notice applies to the following Non-Revision PTO 298 (Election Wave) cases identified in Exhibit A attached hereto.

Dated: December 13, 2018

Respectfully submitted,

/s/ D. Renee Baggett

Renee Baggett, Esq.

Bryan F. Aylstock, Esq.

Aylstock, Witkin, Kreis and Overholtz, PLC

17 East Main Street, Suite 200

Pensacola, Florida 32563

(850) 202-1010

(850) 916-7449 (fax)

E-mail: [baylstock@awkolaw.com](mailto:baylstock@awkolaw.com)

/s/ Thomas P. Cartmell

THOMAS P. CARTMELL

Wagstaff & Cartmell LLP

4740 Grand Avenue, Suite 300

Kansas City, MO 64112

816-701-1102

Fax 816-531-2372

[tcartmell@wcllp.com](mailto:tcartmell@wcllp.com)

**EXHIBIT A**

Alvarado, Clarita	2:13-cv-18616
Anaya, Maria	2:13-cv-13188
Anderson, Trilby	2:13-cv-19669
Arnold, Lydia M.	2:16-cv-01525
Baldwin, Dana	2:15-cv-02511
Beliew, Betty	2:13-cv-08069
Bodiford, Brenda	2:13-cv-07080
Cardenas, Diana	2:13-cv-15940
Cobos, Esperanza	2:17-cv-01986
Demontoya, Rose	2:14-cv-28379
Doss, Paula	2:15-cv-13608
Endsley, Rebecca Lynne	2:12-cv-09220
Escamilla, Eve (deceased)	2:13-cv-17871
Flores, Arnulfa	2:13-cv-04611
Garza, Martha	2:13-cv-18837
Gomez, Leslie Lee	2:13-cv-15778
Griesing, Betty	2:17-cv-01126
Guajardo, Velia	2:13-cv-05768
Herrin, Bettie	2:13-cv-26336
Holloway, Mildred	2:12-cv-03493
Kosakowski, Sonia	2:16-cv-10955
Laney, Minnie	2:14-cv-24528
Messina, Laritza	2:12-cv-02140
Navarette, Yolanda	2:13-cv-23803
Notter, Angela	2:13-cv-03282
Nunez, Mary Helen	2:13-cv-15839
Pitts, Brenda	2:13-cv-24913
Propes, Vicki L.	2:13-cv-21996
Randol, Shannon	2:13-cv-27218
Ray, Darla	2:12-cv-04475
Robinson, Belinda	2:13-cv-29401
Rounds, Clara	2:14-cv-18220
Sandifer, Sylvia	2:14-cv-27651
Shellnut, Melissa	2:13-cv-33879
Stapleton, Shannon	2:12-cv-07987

Stebbins, Nelda Christine	2:13-cv-24191
Taylor, Gloria Jean	2:13-cv-08482
Tolman, Ramona	2:14-cv-07174
Williams, Clara	2:16-cv-03361

**CERTIFICATE OF SERVICE**

I hereby certify that on December 13, 2018, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett  
D. Renee Baggett  
Aylstock, Witkin, Kreis and Overholtz, PLC  
17 E. Main Street, Suite 200  
Pensacola, FL 32563  
850-202-1010  
850-916-7449  
[rbaggett@awkolaw.com](mailto:rbaggett@awkolaw.com)